REQUEST FOR INFORMATION

The F. A. Bartlett Tree Expert Company ("Bartlett") is a tree maintenance company owning a 0.4 acre property (the "Property") within the New Cassel/Hicksville Ground Water Contamination Superfund Site (the "Site"). Bartlett has operated in the same line of work, namely tree maintenance providing services to clients located in the area, from the same location since approximately the late 1950's. In 1987, Bartlett began investigating the Property for potential pesticide and/or herbicide contamination. This ultimately led to a contractor for the New York State Department of Environmental Conservation ("DEC") performing a Preliminary Site Assessment at the Property to determine if a potential source of soil and/or groundwater contamination existed at the Property. In 2000, the DEC added the Property to its registry of inactive hazardous waste sites (Registry No. 130074), stating that the disposal of the following listed hazardous wastes had been confirmed: Dieldrin (P037), alpha-Chlordane (U036), 4,4 DDD (U060), 4,4 DDT (U061), and gamma-BHC (Lindane, U129).

In April 2007, Bartlett entered into an Order on Consent and Administrative Settlement, Index No. W1-1091-06-08, Site #1-30-074, with DEC ("Consent Order"), agreeing to investigate and remediate the Property. Since entering into the Consent Order, Bartlett has completed substantial investigations of the Property, including groundwater, soil and soil vapor monitoring and/or sampling. Additionally, Bartlett has completed remediation involving closure and removal of various structures at the Property. A number of work plans and reports have been prepared, submitted to, and approved by DEC. Generally, the vast majority of contaminants identified are pesticides and herbicides. Bartlett's investigations revealed that certain VOCs are present at the Property; however, these contaminants are not the source of the identified groundwater contamination for the Site. The VOCs of concern with respect to the Site appear to be migrating onto the Property from a source upgradient. To further explain this, Bartlett is submitting a technical memorandum prepared by Brown and Caldwell, the consulting firm who has performed the investigative and remedial work at the Property (the "Technical Memorandum"). Additionally, Bartlett is submitting all of the investigation work plans and reports submitted to DEC so that EPA may have the benefit of the extensive work Bartlett has already performed at this Property under DEC auspices, which further demonstrates the localized nature of the contamination associated with the Property.

With respect to EPA's specific inquiries in its Request for Information, Bartlett has included each inquiry in italics below, with Bartlett's response included thereafter. Where appropriate, Bartlett refers to the Technical Memorandum, the various work plans and reports being submitted with this production request, and other documents also being provided with this Response. Bartlett reserves all of its rights with respect to this submission pursuant to CERCLA and other relevant law.

1. a. *State the correct legal name and mailing address of your Company;*

The F.A. Bartlett Tree Expert Company
1290 East Main Street
Stamford CT 06905

This information was provided by David Marren, Esq., Vice President of Safety and Regulatory Affairs, The F.A. Bartlett Tree Expert Company, 13768 Hamilton Rd. Charlotte, NC 28278; (704)-588-1150 O; (704)-588-5152 F.

b. *State the name(s) and address(es) of the President, Chief Executive Officer and the Chairman of the Board (or other presiding officer) of the Company;*

Robert A Bartlett, Jr., Chairman and CEO
29 Bartlett Lane
Stamford, CT 06903

James B. Ingram, President and COO
7 Swallow Lane
Westport CT, 06880

John E. Signorini, CFO and Executive VP
661A Heritage Hills Antelope Cir
Somers, NY 10589

This information was provided by David Marren, Esq., Vice President of Safety and Regulatory Affairs, The F.A. Bartlett Tree Expert Company, 13768 Hamilton Rd. Charlotte, NC 28278; (704)-588-1150 O; (704)-588-5152 F.

c. *Identify the state and date of incorporation of the Company and the Company's agents for service of process in the state of incorporation, and in New York State; and*

Bartlett was incorporated in 1907 in the State of Connecticut. CT Corporation, 111 Eighth Avenue, New York, NY 10011 is Bartlett's agent for service in New York. Bartlett's agent for service in Connecticut is Fred Tobin, Secretary, 1290 E. Main Street, Stamford, 06905.

This information was provided by David Marren, Esq., Vice President of Safety and Regulatory Affairs, The F.A. Bartlett Tree Expert Company, 13768 Hamilton Rd. Charlotte, NC 28278; (704)-588-1150 O; (704)-588-5152 F.

d. *If your Company is a subsidiary or affiliate of another corporation or entity, identify each of those other corporations or entities and for each, the President, Chief Executive Officer and Chairman of the Board. Identify the state of incorporation and agents for service of process in the state of incorporation and in New York State for each corporation identified in your response to this question.*

Bartlett is not a subsidiary or affiliate of any other company.

This information was provided by David Marren, Esq., Vice President of Safety and Regulatory Affairs, The F.A. Bartlett Tree Expert Company, 13768 Hamilton Rd. Charlotte, NC 28278; (704)-588-1150 O; (704)-588-5152 F.

2. *Identify the address, Section, Block and Lot numbers, and the size of each property (hereinafter, "Property" or "Properties") that your Company either presently owns and/or formerly owned within the Site from the date your Company, or any related company had an ownership interest. (See Definitions section for terms.):*

The Property owned by Bartlett is located on Long Island, at 345 Union Avenue in the Village of Westbury, Nassau County, New York. The Property is identified in the Nassau County Tax Rolls as Section 10, Block 228, Lot 786 and Section 10, Block 228, Lot 206. The Property consists of a narrow parcel of land measuring approximately 340 feet in length by 60 feet wide, totaling approximately 0.4 acres. It is bordered on the north by a municipal parking lot; on the east by a construction materials warehouse; on the south by Union Avenue, followed by the Long Island Railroad, a parking lot and cemetery; and on the west by a taxi fleet maintenance facility and construction contractor's storage yard.

The Property consists of two parcels; one parcel which was purchased in 1963, making up the majority of the 0.4 acres (Lot 206). By deed dated March 31, 1995, Bartlett purchased a fifty foot wide strip running the length of the property along the western border of the Property from 333 Union Avenue Corp., 333 Union Avenue, Westbury, NY, 11590, for ingress and egress purposes (Lot 786).

This information was derived from a number of documents submitted with this response package. The accompanying Index identifies which documents contain information used in the response to this question. Portions of this information were provided by David Marren, Esq., Vice President of Safety and Regulatory Affairs, The F.A. Bartlett Tree Expert Company, 13768 Hamilton Rd. Charlotte, NC 28278; (704)-588-1150 O; (704)-588-5152 F.

3. *For each Property identified in response to question 2 in which your Company has and/or had an ownership interest currently or in the past, please identify:*

a. *The date your Company acquired an ownership interest. An ownership interest includes, but is not limited to, fee owner, lessor or lessee, licensee and/or operator;*

Bartlett purchased Lot 206, the majority of the Property, on February 26, 1963, from Elsie Christ, 32 Longfellow Ave, Westbury NY. Bartlett previously rented Lot 206 beginning in approximately the late 1950's. After a diligent search, Bartlett was unable to locate a copy of any lease document, and, given the number of years that have passed, there are no remaining employees with knowledge of the date Bartlett began leasing the property, or of the contents and terms of any

lease(s). Bartlett is unaware of the whereabouts of any former employees who would have known this information, if any exist. Accordingly, it is Bartlett's best estimate that it began leasing the site a few years prior to its purchase of Lot 206 in 1963.

As stated in Response 2, above, on March 31, 1995, Bartlett purchased a small strip of property, Lot 786, for ingress and egress. From July 1, 1988 to June 30, 1991, Bartlett leased this strip of property from George Oil Corp., 333 Union Avenue, Westbury, NY 11590. Bartlett believes, but does not have independent confirmation, that George Oil Corp. is a related entity to 333 Union Avenue Corp., the entity who sold this property to Bartlett. The purpose of the lease was to provide Bartlett space to park its service vehicles and equipment. After the termination of the lease term, Bartlett did not maintain any ownership interest in this property until its purchase of it in 1995.

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b. The name and address of all other current and/or previous owners;

Prior to Bartlett, Ms. Elsie Christ, 32 Longfellow Avenue, Westbury, NY owned the Property (Lot 206). Bartlett is unaware of the ownership status prior to Ms. Christ because her ownership was more than fifty years ago. However, Sanborn fire insurance maps dated 1920, 1929 and 1941 indicate the Property (Lot 206) was occupied by E. J. Christ (or C. Christ) blacksmith, wagon works and auto repairs as early as 1920. The 1910 Sanborn map shows a wagon works and auto repair facility, but does not indicate who the proprietor might have been. The strip of property purchased in March 31, 1995 (Lot 786) was previously owned by 333 Union Avenue Corp., which Bartlett believes is related to George Oil Corporation, the lessor to Bartlett's brief lease. Bartlett is unaware of the ownership status prior to 333 Union Avenue Corp. and/or George Oil Corp. because of its limited interaction with that property. There are no other current owners of the Property besides Bartlett.

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c. *All individuals or entities that have leased, subleased or otherwise operated at each Property at any time currently or in the past, and identify the dates (month and year) that each such individual or entity began and ended its leasehold interest or its operations;*

During Bartlett's lease of Lot 786 from the George Oil Corp., namely, from May 12, 1989 through May 11, 1991, Bartlett subleased approximately 4,000 square feet of space which was located at the rear 40 feet of the northerly side of 333 Union Avenue, Westbury, NY to Cross Island Welding & Equipment Repair, Inc., of 6 Twelfth Street, Carle Place, NY 11514. Cross Island Welding & Equipment Repair subleased its premises for only the brief period of time indicated on its lease, ending in May, 1991.

Bartlett has not leased, subleased, or otherwise permitted any other individuals or entities to operate at the Property at any time currently or in the past.

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d. *Any portion of any Property which was transferred or sold, and the block and lot number, the date of the transfer or sale, the sale price and the entity that acquired the Property;*

The Property has not been transferred or sold to any third parties since Bartlett's acquisition.

This information was provided by David Marren, Esq., Vice President of Safety and Regulatory Affairs, The F.A. Bartlett Tree Expert Company, 13768 Hamilton Rd. Charlotte, NC 28278; (704)-588-1150 O; (704)-588-5152 F.

e. *The relationship, if any, between your Company and each of the individuals and/or other entities identified as having leased or operated at each Property;*

There is no relationship between Bartlett and the sole tenant, Cross Island Welding & Equipment Repair ("Cross Island"), other than the brief tenancy Cross Island held at the Property.

This information was provided by David Marren, Esq., Vice President of Safety and Regulatory Affairs, The F.A. Bartlett Tree Expert Company, 13768 Hamilton Rd. Charlotte, NC 28278; (704)-588-1150 O; (704)-588-5152 F.

f. *Your Company's involvement in all operations conducted by each lessee and/or other individual or entity identified in response to question 3c., above; and*

Bartlett had no involvement in Cross Island's operations.

This information was provided by David Marren, Esq., Vice President of Safety and Regulatory Affairs, The F.A. Bartlett Tree Expert Company, 13768 Hamilton Rd. Charlotte, NC 28278; (704)-588-1150 O; (704)-588-5152 F.

g. *For each Property, provide all documents relevant to your responses to questions 3a.- 3f., above, and provide copies, including, but not limited to, copies of surveys, title search documents, deeds, rent rolls, leases and correspondence.*

Bartlett has included copies of the surveys, leases and other documents in its possession, and has provided all information available to it regarding any documents it could not locate or identify above. The documents are listed on an Index accompanying this production, which also designates which question(s) each document responds to.

Portions of this information were provided by David Marren, Esq., Vice President of Safety and Regulatory Affairs, The F.A. Bartlett Tree Expert Company, 13768 Hamilton Rd. Charlotte, NC 28278; (704)-588-1150 O; (704)-588-5152 F. Portions of this information were provided by Frank Williams, PG, Brown & Caldwell, 234 Hudson Avenue Albany, New York 12210.

4. *Provide copies of all maps, building plans, floor plans and/or drawings for each Property identified in response to question 2., above. Your response to this question should include, but not be limited to, providing plumbing and drainage system plans for all structures on each Property*:

Please see Index #2 and the Remedial Investigation Report (Index #28), Appendix A, for all floor plans that have been identified with due diligence, including via request to local code enforcement and other authorities. The reports referenced in the Index as responsive to this question describe Bartlett's efforts to obtain these documents.

This information was provided by Frank Williams, PG, Brown & Caldwell, 234 Hudson Avenue, Albany, New York 12210.

For both current (if still in operation) and past operations during the period of time that the Company was at a Property, please identify and provide a description of:

a. *all surface structures and features (e.g., buildings, above-ground storage tanks, paved, unpaved areas and parking lots, and dates when paved areas were paved);*

The Property configuration currently consists of a two-story office/garage structure with asphalt paved driveway and parking areas. Nearly all the ground surface is paved and serves as a parking area for tree care vehicles. Some areas of the parking area are temporarily unpaved and are pending construction of a storage structure and repaving, which is expected to occur after remediation of the Property is complete. The facility is accessed from Union Avenue via two driveways located on either side of the Bartlett office building. A chain link fence extends along the western and northern property boundaries, with a smaller section of fencing traversing the property from east to west and enclosing the northern parking/storage areas. Bartlett's service vehicles are parked in the northern portion of the Property and, temporarily, in a locked garage on the ground floor of the office building near the facility entrances on Union Avenue.

Until they were demolished in 2008, three additional structures were present on the Property: a garage; an enclosed storage shed; and an open shed. These structures were demolished to create more space for Bartlett's service vehicles and for temporary storage of nursery stock. Please see the Technical Memorandum and the documents submitted with this production, which are identified on the Index, for more information.

This information was derived from a number of documents submitted with this response package. The accompanying Index identifies which documents contain information used in the response to this question. Portions of this information were provided by David Marren, Esq., Vice President of Safety and Regulatory Affairs, The F.A. Bartlett Tree Expert Company, 13768 Hamilton Rd. Charlotte, NC 28278; (704)-588-1150 O; (704)-588-5152 F, and portions of this information were provided by Frank Williams, PG, Brown & Caldwell, 234 Hudson Avenue Albany, New York 12210, the primary author of the reports and Technical Memorandum submitted with this response package.

b. *all past and present plumbing systems, above and below-ground discharge piping, sumps, storm water drainage systems, sanitary sewer systems, septic tanks, dry wells, subsurface disposal fields, and underground storage tanks ; and*

Water and sewer service is currently provided by the municipality. Sanitary wastes may have been initially discharged to an on-site cesspool or drywell (Drywell 1) located in the northern portion of the Property, approximately 20 feet south of the former open shed. Drywell 1 is classified as an EPA on-site injection well Type 5X27 (other wells). Located approximately 65 feet from the north property boundary, it may have originally been part of the carriage manufacturing facility that predated Bartlett's occupancy. Prior to its removal in 2012, Drywell 1 was covered with a solid cast iron lid which prevented most stormwater runoff from entering. Drilling through the structure indicated a hard base at

approximately 6 feet bgs. The status of Drywell 1 is TA (temporarily abandoned) pending completion of IRM for this drywell. After Bartlett investigated Drywell 1 in 1987, it was backfilled with sand out of concern that it could cave in due to the heavy traffic in the driveway.

Architectural plans from 1963 (Appendix A of the Remedial Investigation Report, Index #28, attached) show a potential second drywell or cesspool (Drywell 2) at a location approximately 112 feet north of the current office building, adjacent to the west wall of the garage, in an area that is now paved. Investigations conducted as part of the RI indicate that Drywell 2 does not exist and was probably never constructed. Sanitary wastes from the two story office/garage structure were discharged to a concrete drywell/cesspool (Drywell 3) located near the northwest corner of the structure. This drywell is classified as an EPA on-site injection well Type 5W31 (septic system). No connections to floor drains or other structures were identified during abandonment activities. The drywell was covered with a solid cast iron lid that would have prevented most stormwater runoff from entering the drywell. Drywell 3 was decommissioned in 2009 after the office/garage sanitary system was connected to the municipal sanitary sewer on Union Avenue. During decommissioning, impacted materials were removed from the drywell and it was filled with flowable fill. The DEC approved the abandonment on July 27, 2010. The status is PA (permanently abandoned).

The aforementioned architectural plans show the floor drain at the base of the exterior stairwell on the north side of the office building. The drain was classified as an EPA on-Site injection well Type 5D2 (stormwater drainage well). The floor drain received storm water runoff from the surrounding paved areas. The plans show the floor drain connecting to a pre-cast dry well located a few feet to the north and west of the stairway (presumably Drywell 3). The floor drain was abandoned by filling the cavity with Portland concrete. The DEC approved the abandonment on July 27, 2010. The status is PA (permanently abandoned). During the closure of Drywell 3 it was determined that no connection to Drywell 3 existed, and that the stairwell floor drain discharged directly to the sandy soil underling the stairwell.

The office building is currently heated by a natural gas-fired furnace located in a room on the first floor near the northwest corner. Bartlett contacted the Westbury Fire Department in an effort to identify any records pertaining to potential former fuel storage tanks at the facility, but was informed that the department only has records dating to 2002, which are limited to identifying the type of heat a facility has. Architectural plans obtained from the Westbury Building Department suggested the possibility that an underground fuel oil storage tank may have been in use at one time. (Plans that were obtained are being submitted with this response package.) Plans dated 1964 provide for the addition of an exterior stairway on the north side of the building, an exterior heater room, and a buried 350 gallon fuel oil tank approximately four feet north of the heater room. However, later plans dated 1966 show the exterior stairway as "existing" but do not show the heater room. Currently, the exterior stairway exists but there is no

structure that corresponds to the heater room, indicating that the heater room was not built. Subsurface investigations completed at the Property, which are described in the RIR submitted herewith, found no evidence of a fuel oil tank.

For more information, please see the Technical Memorandum and the documents submitted with this production, which are identified on the Index. This information was derived from a number of documents submitted with this response package. The accompanying Index identifies which documents contain information used in the response to this question. Portions of this information were provided by Frank Williams, PG, Brown & Caldwell, 234 Hudson Avenue Albany, New York 12210, the primary author of the reports and Technical Memorandum submitted with this response package.

c. *all currently existing and previously existing chemical and industrial hazardous substance storage, transfer, spill and disposal areas;*

During the extensive investigation and remediation work completed by Bartlett at the Property, Bartlett gained significant knowledge of the location of various structures on site where historical storage, transfer, spill, or disposal may have occurred. The location and background relating to these areas is described below, as well as the relevant remedial investigation, including sampling results.

Storage of Plant Health Care Materials

To the extent any plant health care materials used by Bartlett constitute chemical and/or industrial hazardous substances, formerly, small amounts of plant health care materials were stored in a locked, fire proof storage container within a locked structure located midway along the eastern side of the facility, adjacent to the former garage. This storage structure had a concrete floor and met or exceeded all relevant state and federal regulations for the storage of such materials. Granular fertilizers and chainsaw bar oil were also stored in the storage structure. After the aforementioned buildings were demolished, the locked, fire proof storage container was relocated adjacent to the north side of the two-story office/garage structure. This container also meets or exceeds all relevant state and federal regulations for pesticide storage, including a containment berm and impervious floor. Bartlett is not aware of any current or former pesticide storage area other than the locked, fire proof storage structure.

Although no information had been identified that indicated the existence of any pesticide storage area other than the locked, fire proof storage container within the structure near the former garage, and there was no evidence that the open shed at the north end of the Property was ever used for pesticide storage, the DEC requested soil sampling in the area of the open shed as well as the pesticide storage area adjacent to the former garage. Soil samples were collected in October 2008 within the footprint of the former structure. Other than the

common laboratory contaminant methylene chloride, no VOCs or PCBs were detected in any of the soil samples from this area. A number of PAHs and Carbazole were detected, primarily in the shallow sample immediately beneath the asphalt floor, which suggests that the PAHs may be from particles of asphalt incorporated in the soil sample. Detected pesticides/herbicides consisted of 2-methyl-4-chlorophenoxyacetic acid (MCPA); gamma-BHC (Lindane); alpha- and gamma-Chlordane; DDT (with its breakdown products DDD and DDE); Dieldrin; Endosulfan II; Endrin aldehyde; Ethion; and Methoxychlor. None of the pesticide/herbicide concentrations exceeded the SCOs for Protection of Public Health – Commercial Use, and Protection of Groundwater. Mercury was detected in the shallow sample at a concentration above the Protection of Groundwater SCO. A number of other metals were detected in the shallow soil sample at concentrations above those typically found elsewhere on the Property, but below the SCOs for Protection of Public Health – Commercial Use, and Protection of Groundwater. Given that no VOCs were detected here, this area could not have contributed to groundwater contamination at the Site.

Drywell 1

On May 5, 1987, Bartlett investigated a report that an abandoned "cistern" at the Westbury facility (now known as Drywell 1) allegedly held empty pesticide containers. In April 1990, an anonymous caller to the DEC alleged that pesticides and herbicides were periodically placed into Drywell 1 prior to abandonment in 1983. Upon investigation, Bartlett found that Drywell 1 was partially filled with water, which was sampled. Bartlett also recovered two Sevin containers (empty, crushed 5-gallon metal pails). After the inspection, Drywell 1 was backfilled with clean sand out of concern that it could cave in under heavy traffic in the driveway. The sample of the standing water in Drywell 1 was submitted to an independent laboratory for testing. The pesticide diazinon was detected at 0.61 parts per million (ppm). Sampling occurred in and near the Drywell in 2008. VOCs detected in the soils were limited to methylene chloride and acetone at concentrations below applicable SCOs. Both VOCs are common laboratory contaminants. No SVOCs were detected. Together, the VOC and SVOC results indicate these locations are not impacted by solvents (primarily petroleum distillates) that were typically used as carriers for pesticide and herbicide solutions.

The concentrations of metals detected in the soils surrounding Drywell 1 are consistent with metals concentrations found across the Property and, therefore, probably reflect typical urban background conditions. The metals results indicate that the soils adjacent to the drywell are not impacted by inorganic pesticides/herbicides that contained metals such as copper, lead, and arsenic.
Pesticides/Herbicides detected in the soils at the 2008 sampling locations around

Drywell 1 consist of DDT (with its breakdown products DDD and DDE), Dieldrin, and Methoxychlor. With the minor exception of Dieldrin in boring SB-3 (0.11/0.12 mg/kg), none of the pesticides/herbicides exceed the SCOs for Protection of Public Health – Commercial Use, and Protection of Groundwater.

In 2010, a boring was advanced through Drywell 1 to assess potential pesticide and VOC impacts within and beneath the drywell. A tar-like odor was noted from soils collected from 12 to 22 ft. bgs, and a hydrocarbon odor and evidence of black staining was noted on soils from 34 to 36 ft. bgs. PID readings ranged from 1.7 to 41.8 parts ppm within the stained and/or odor emitting intervals. VOCs detected in the soils beneath Drywell 1 at concentrations exceeding the applicable SCOs consisted of ethylbenzene, total xylenes, and methylene chloride. Concentrations of ethylbenzene and total xylenes exceeded their respective SCO's for Protection of Groundwater. Those exceedances were observed in two soil samples (12-14 and 14 16 ft. bgs) collected from intervals exhibiting elevated PID readings, odors and/or staining. Ethylbenzene and xylenes are components of petroleum distillates, (carriers for pesticide solutions). Methylene chloride, a common laboratory contaminant, was detected at a concentration above the SCO for Protection of Groundwater in one sample (38-40 ft. bgs); however, methylene chloride was not detected in groundwater. Pesticides/herbicides detected above the applicable SCOs in the soils beneath Drywell 1 consisted of DDT (and its degradation product DDD), Aldrin, Dieldrin, and gamma-BHC (Lindane). No exceedances of the applicable SCOs were detected in the soil sample collected at the bottom of boring (38-40 ft. bgs), thereby vertically delineating the exceedances in the soil matrix.

The aforementioned sampling for pesticides/herbicides in the soils adjacent to Drywell 1 indicate that, with the minor exception of Dieldrin in SB-3, no pesticides or herbicides exceed the SCOs for Protection of Public Health – Commercial Use, and Protection of Groundwater in this surrounding area. Additionally, there was no evidence of odors and/or staining, and PID readings for all borings remained at background concentrations. Thus, the 2008 and 2010 data indicated the horizontal limits of significant soil impacts were confined to a column of soil beneath Dry Well 1.

The 2010 sampling results from Drywell 1 were compared with the 1996 PSA completed by DEC which includes data from the same location. Previously, the VOCs, benzene, ethylbenzene and total xylenes exceeded the now obsolete TAGM 4046 recommended soil cleanup objectives (RSCOs) in use at that time. Benzene was not detected in the 2010 sampling and the 2010 concentrations of ethylbenzene and total xylenes were significantly less than the 1996 concentrations. Previously, the pesticides DDT (and its degradation products DDD and DDE), dieldrin, gamma-BHC (Lindane), Methoxychlor, alpha-and

gamma-chlordane exceeded the TAGM 4046 RSCOs. The 2010 concentrations of those pesticides were similar to or less than the 1996 concentrations. In fact, the 2010 concentrations of DDT were an order of magnitude less than those of the 1996 sampling. The data for soils under Drywell 1 indicate that, at least for the VOC's and DDT, natural attenuation occurred over the 14 years that elapsed since the PSA sampling.

In 2011, in anticipation of an IRM to remove impacted soils associated with Drywell 1, additional soil borings were advanced for the purpose of delineating soils that might require management as listed hazardous waste. A soil boring was advanced through Drywell 1 for the purpose of confirming the concentrations of pesticides identified in previous samples. The analytical results for these samples confirm that exceedances of the SCOs for DDD and DDT extend downward from the base of Drywell 1 to the zone of water table fluctuation. The exceedances of the SCOs for DDD and/or DDT generally extended outward from the axis of the drywell to the inner set of delineation borings, but not to the outer set placed several feet further away from the Drywell. No VOCs were detected in excess of respective SCOs in any of the 2011 sample locations. In 2012, Bartlett conducted an IRM to remove Drywell 1 and the associated contaminated soils down to the depth of the water table. Confirmation sampling was completed, which detected no VOCs in either post-excavation sample. The pesticide Dieldrin was detected in one of the post-excavation samples. The pesticides DDT, DDD, DDE, and gamma Chlordane were detected in both samples. The concentrations of the detected pesticides are comparable to those detected in the 28-32 foot depth interval during the previous investigation of Drywell 1. The status of Drywell 1 is TA (temporarily abandoned) pending completion of IRM for this drywell.

Overall, although the SCOs for protection of groundwater indicate a potential for these soils to have adversely impacted groundwater quality under certain conditions, no such impacts actually occurred. This is not surprising given the separation of the impacted soils and the water table of 15 feet or more. Further, because the impacted soils were removed, any such potential no longer exists.

Drywell 2

The sampling of the suspected Drywell 2 area (which drywell was found not to exist) revealed no VOCs other than the common laboratory contaminants acetone and methylene chloride based on soil samples collected. No SVOCs or PCBs were detected. Pesticides/Herbicides detected in the soil samples consist of DDT (with its breakdown products DDD and DDE) and Methoxychlor. None of the pesticide/herbicide concentrations exceed the SCOs for Protection of Public Health – Commercial Use, and Protection of Groundwater. The concentrations of metals detected in the samples do not differ substantially from concentrations

found elsewhere on the Property and are consistent with a typical urban background. As stated above, given that no VOCs were detected in this area, i t is not likely that it contributed to groundwater contamination of the Site.

Drywell 3

Drywell 3 was also investigated for the potential of historical spills. In 2008, visual inspection of Drywell 3 through its manhole had revealed a below grade structure filled with liquids and suspended solids associated with sanitary sewage. A thin layer of LNAPL with a petroleum like odor was noted on the surface of the liquids/suspended solids. The source of these materials was not identified. Analysis of a solid material sample at the base of the dry well revealed concentrations of ethylbenzene, toluene, and total xylenes exceeded the Protection of Groundwater SCOs. No other VOCs were detected, and no other analytes of any category exceeded the SCOs for Protection of Public Health – Commercial Use, and Protection of Groundwater. SVOCs detected in the solids consisted of naphthalene and 2 methylnaphthalene (constituents of petroleum distillates such as diesel and fuel oil), phenanthrene (a common polynuclear aromatic hydrocarbon compound or PAH), and bis(2 ethylhexyl)phthalate (a common plasticizer). No PCBs were detected.

Pesticides/herbicides detected in the solids consisted of MCPP [2 (2 Methyl 4-chlorophenoxy)propionic acid], DDT (with its breakdown products DDD and DDE), alpha and gamma Chlordane, and beta BHC. The concentration of copper in the solids sample was higher than elsewhere on the Property and may reflect elevated copper levels typical of septic waste. The concentrations of other metals do not differ substantially from concentrations found elsewhere on the Property and are consistent with a typical urban background.

The gas chromatograph (GC) fingerprint for the NAPL sample was most similar to the laboratory's Diesel/Number 2 Fuel Oil reference chromatogram. When the laboratory calculated total sample area in the C8 C40 normal hydrocarbon range as petroleum distillate, it was found to be present at 84% by weight. The detected VOC and SVOC analytes consisted of ethylbenzene, toluene, total xylenes, naphthalene, 2 methyl naphthalene, fluorene and phenanthrene, all potential constituents of Diesel/Number 2 fuel oil. The NAPL sample also included methylene chloride, a common laboratory contaminant. No PCBs were detected. Detected pesticides/herbicides consisted of part per billion concentrations of 2,4 DB; 2,4,5 T (trichlorophenoxyacetic acid); and alpha Chlordane. Such concentrations are low considering the relatively high solubility of most pesticides in petroleum distillates.

The analytical results collected from a soil boring which was installed presumably downgradient of Dry Well 3 indicate these soils were not impacted by the drywell contents. No VOCs other than the common laboratory contaminants acetone and methylene chloride were detected, in contrast to the ethylbenzene, toluene, and xylenes detected in the sample of solids from the base of Drywell 3. No SVOCs or PCBs were detected. Pesticides/Herbicides detected in the samples from SB-8 consist of alpha and gamma Chlordane; and DDT (with its breakdown products DDD and DDE). None of the pesticide/herbicide concentrations exceed the SCOs for Protection of Public Health – Commercial Use, or Protection of Groundwater. The concentrations of metals detected in the samples from the soil boring do not differ substantially from concentrations found elsewhere on the Property and may reflect typical urban background.

The petroleum product(s) and pesticides/herbicides detected in the materials contained within Drywell 3 indicated the need to terminate its use as a cesspool and properly close it. The closure activities were conducted on August 4 and 5, 2009, in accordance with an approved closure Work Plan (BC, February 2009), the results of which were submitted to the DEC in Remedial Action Report for Dry Well 3 and the Mechanics Pit (Brown and Caldwell, March 2010), Index # 18. The closure consisted of the removal of the Drywell 3 contents (solids and liquids) and their off-site disposal in permitted facilities. Approximately one foot of sandy material was removed from the open bottom of Drywell 3. The drywell was found to have no connections to the floor drain located in the exterior stairwell on the north side of the Office Building or to the mechanic's pit located in the ground floor of the Office Building. After sampling and the inspection of Drywell 3 was complete, the well was backfilled using 50 psi flowable fill (concrete) material. After the completion of all removal activities and before backfilling the drywell, confirmation samples were collected at the base of the removal area (i.e., the drywell floor) and 18" to 24" below the base of the removal area. The analytical results indicate that there were no exceedances of applicable SCOs in the soil remaining under the drywell. Therefore, all potentially impacted materials have been addressed and the closure of Drywell 3 is considered complete. As with Drywell 1, any potential contamination of groundwater did not occur here as the impacted soils were separated from the groundwater table by 15 feet or more, and in any event, the impacted soils were removed, therefore no potential for contamination exists.

Stairway Floor Drain

During the closure of Drywell 3, the cover of the Stairway Floor Drain was removed and its contents were inspected and sampled. The interior of Drywell 3 was inspected to identify any drain pipe potentially connected to the floor drain. The potential for connection between Drywell 3 and the Stairway Floor Drain

was tested by introducing water into the drain and observing the interior of Drywell 3 (after cleaning) for evidence of drainage. None was observed. A representative of the NCDH who was present during the test, concurred that the drain did not connect to Drywell 3. It appears that the stairway floor drain discharged storm water directly to the subsurface soils immediately under the drain. A sample of the soils located in the bottom of the drain was collected. This sample was submitted for analysis of VOCs, SVOCs, pesticides, herbicides, PCBs, and metals.

Analytical results indicate the soil material in the floor drain contains the PAH compound benzo(a)pyrene at a concentration slightly above the SCO for protection of human health. However, direct human contact with the soil under the stairway floor drain was restricted by the drain cover. The concentrations of two other PAHs, benzo(b)fluoranthene and chrysene, and one metal, chromium, slightly exceed the SCOs for protection of groundwater. The PAHs could be present at these low concentrations due to run-off from the asphalt parking lot and driveway area, and are not expected to be associated with the historic operations of the Property. The chromium impact is only slightly over SCO and is not expected to be an environmental concern. This is because (per the technical support document for development of the SCOs) the protection of groundwater SCOs are based on the conservative assumptions that 1) contaminated soil and groundwater are in direct contact; and 2) there is a continuous flow of leachate and an infinite source of contamination. The slight exceedances noted in the soil under the stairway floor drain are unlikely to impact groundwater because the flow of stormwater through these soils is intermittent and the volume of soil through which that flow occurs is limited.

Due to the location of this drain, and the relatively low concentrations of compounds which exceed DEC soil cleanup objectives, the DEC concurred that no further action was needed for the drain. Bartlett subsequently eliminated the need for the floor drain by diverting stormwater from the surrounding pavement, and then abandoned the drain by removing the metal cover and filling the hole with concrete. Due to the location of this drain, and the relatively low concentrations of compounds which exceed DEC soil cleanup objectives, no further action was recommended by DEC for this area. Given DEC approval of the completed remedial activities at this location, the thirty feet separating potential contaminants from groundwater, and the low likelihood of impacting groundwater due to lack of exposure to stormwater, no risk of contamination to groundwater at the Site exists here. In fact, the soil concentrations here were so far below the relevant SCOs for protection of groundwater that there would be no threat to groundwater quality even if they were somehow exposed to potential leaching by precipitation.

Mechanic's Pit

A mechanic's pit located in the ground floor of the office building was also identified by DEC as an area where potential spills may have occurred. Bartlett investigated and closed this area. The mechanic's pit on the ground floor of the office building was closed on August 4 and 5, 2009, in accordance with an approved closure Work Plan (BC, February 2009, Index #15), the results of which were submitted to the DEC in Remedial Action Report for Dry Well 3 and the Mechanics Pit (Brown and Caldwell, March 2010), Index #18. During closure activities, the wooden planking over the mechanics pit was removed. The stone backfill was removed from the pit using a small excavator and placed on poly sheeting adjacent to the pit. Inspection of the stone backfill and screening with a photoionization detector (PID) did not reveal evidence of obvious contamination (e.g., staining, odors, elevated VOC levels). The interior of the pit was inspected and determined to have a floor of solid concrete. The concrete walls and concrete floor slab did not evidence staining nor any cracking or visible pipe entries or exits. There were no drains exiting the pit.

During closure activities, gravel backfill was removed from the former mechanics pit. Discolored soil material was removed from the surface of the concrete floor slab in the mechanics pit. The discolored material contained concentrations of arsenic, chromium, lead, mercury and gamma-BHC (also known as Lindane) in excess of the Part 375-6 Soil Cleanup Objectives (SCOs) for protection of groundwater. The concentration of arsenic also exceeded the SCO for protection of human health. All this soil material was collected and containerized in a 55-galllon DOT-approved drum for disposal. Sampling of the soil beneath the concrete floor slab of the pit indicated that the soil had not been impacted by the contaminants in the material above the concrete slab. The DEC and NCDH indicated that no further investigation or remediation of the Mechanic's Pit was required. As with the stairwell floor drain, with 30 feet separating any potential contaminants from groundwater and the very low concentration of chlorinated VOCs, there is no threat to groundwater quality here, even if the contaminants were somehow exposed to potential leaching by precipitation.

Other Investigations

Further investigations have occurred at the Property pursuant to the Consent Order, including investigations to determine whether underground storage tanks are present at the Property, and if releases to shallow soil occurred. A geophysical survey performed at the Property identified two small areas of electromagnetic anomalies and GPR reflectors. An anomaly identified in the northeast portion of the Property was termed Anomaly 1, and a second anomaly adjacent to the exterior stairs on the north side of the office building was referred

to as Anomaly 2. In a letter to DEC (BC, June 24, 2008) excav ation of test pits at these anomalies (rather than soil borings) was proposed to avoid the risk of drilling through a potential buried container or UST.

The test pit for Anomaly 1 encountered fill consisting primarily of sand and clayey silt. Two north south oriented pipes were uncovered: a 4 inch diameter cast iron pipe and an overlying, 1 inch diameter steel pipe. These metallic objects are considered to be the cause of the geophysical anomalies identified in this area. The pipes are not known to be in use by the Bartlett facility and their origins, purposes and contents are unknown. Because the functions of the pipes are unknown, the test pit excavation was terminated at 1.5 feet bgs to avoid undermining or damaging the pipes. No staining of the fill was observed around the bell/spigot joints of the cast iron pipe, and all VOC readings on the PID were zero. A sample of soil was also collected in the vicinity of the pipes. Low (less than 1 ppm) concentrations of the following VOCs were detected: acetone; cis 1,2 dichloroethene; methyl ethyl ketone (MEK); methylene chloride; PCE; and TCE. Of these, only the concentration of acetone exceeded a SCO (Protection of Groundwater). The only SVOCs detected were PAHs (possibly from the asphalt paving) at concentrations below their SCOs. No PCBs were detected. Detected pesticides/herbicides consisted of gamma BHC (Lindane); alpha and gamma Chlordane; DDT (with its breakdown products DDD and DDE); and Dieldrin. None of the pesticide/herbicide concentrations exceeded their SCOs. A number of metals were detected at concentrations above those typically found elsewhere on Property, but below the SCOs.

For Anomaly 2, located adjacent to the exterior stairs on the north side of the office building, a test pit was excavated to a depth of approximately 5 feet bgs. No evidence of a UST was found. The test pit encountered fill comprised of variable mixtures of sand and gravel, silty clay, coal, cinders and bricks. All PID readings were zero. A sample of the fill was collected from approximately 1 2-feet bgs. The only VOC detected was the common laboratory contaminant methylene chloride at a concentration below the SCOs. The only SVOCs detected were PAHs (common in urban areas and present in asphalt paving) at concentrations below their SCOs. No PCBs were detected. Detected pesticides/herbicides consisted of gamma BHC (Lindane); alpha Chlordane; DDT (with its breakdown products DDD and DDE); Dieldrin; and Methoxychlor. None of the pesticide/herbicide concentrations exceeded their respective SCOs. Mercury was detected at a concentration above the SCOs. Several other metals were detected at concentrations above those typically found elsewhere on the Property, but were below their respective SCOs.

Investigations occurred near the open shed formerly located at the north end of the Property, which was demolished in July 2008. Other than the common

laboratory contaminant methylene chloride, no VOCs, SVOCs, or PCBs were detected in any of the soil samples from this area. Detected pesticides/herbicides consisted of 2,4 D; DDT (with its breakdown products DDD and DDE), alpha-Chlordane; gamma-BHC; and Methoxychlor. None of these concentrations exceeded the SCOs for Protection of Public Health – Commercial Use, and Protection of Groundwater. The concentrations of metals detected in the samples do not differ substantially from concentrations found elsewhere on the Property and are consistent with typical urban background.

Overall, the RI data demonstrate that the only VOC resides on the Property that had a potential to impact groundwater quality never actually did, and Bartlett's extensive remedial actions ensure no impacts will occur in the future.

Please see the Technical Memorandum and the documents submitted with this production, which are identified on the Index, for more information. This information was derived from a number of documents submitted with this response package. The accompanying Index identifies which documents contain information used in the response to this question. Most of this information was provided by Frank Williams, PG, Brown & Caldwell, 234 Hudson Avenue Albany, New York 12210, the primary author of the reports and Technical Memorandum submitted with this response package.

5. *For each Property identified in question 2., above, at which your Company conducted operations, describe in detail the manufacturing processes and/or other operations that your Company conducted at the Property, and identify the years during which your Company conducted operations there. If those operations were not constant throughout your Company's operations, describe the nature of all changes in operations, and state the year of each change. If detailed information about your Company's operations is not available, provide, at a minimum, a general description of the nature of your Company's business at the Property, the years of operation, the type of work your Company conducted, and the number of employees for all the operations:*

No manufacturing processes occurred at the Property during Bartlett's occupancy. Since the mid-to late 1950s, the Property has been used by Bartlett as a base for tree maintenance services, including applications of pesticides and herbicides on clients' properties. Bartlett provides tree and shrub care services, including tree trimming, tree cabling, storm damage removal, fertilization and soil management, plant analysis and diagnostics, and pest management to residents of Queens County, Kings County, and Nassau County, New York at their residences and businesses. These operations have been constant throughout Bartlett's years of operations. Generally, Bartlett has between 10-15 employees for its operations.

Portions of this information were provided from publicly available sources, as

well as by David Marren, Esq., Vice President of Safety and Regulatory Affairs, The F.A. Bartlett Tree Expert Company, 13768 Hamilton Rd. Charlotte, NC 28278; (704)-588-1150 O; (704)-588-5152 F. Portions of this information were provided by Frank Williams, PG, Brown & Caldwell, 234 Hudson Avenue Albany, New York 12210, the primary author of the reports and Technical Memorandum submitted with this response package.

6. *With respect to industrial wastes at a Property:*

a. *List all industrial wastes that were used, stored, generated, handled or received by your Company at the Property. Your response to this question should include, but not be limited to, use, storage, generation and/or handling of trichloroethylene ("TCE"), tetrachloroethylene ("PCE"), 1,1,1-trichloroethane ("1, 1,1-TCA") and other chlorinated or non-chlorinated solvents. Be as specific as possible in identifying each chemical, and provide, among other things, the chemical name, brand name, and chemical content;*

Generally, Bartlett does not engage in manufacturing, so no industrial waste is generated on site. To the extent any products that ultimately would be treated as industrial waste are used by Bartlett, these products make up a minute portion of Bartlett's waste stream. The vast majority of waste generated by Bartlett is green waste, such as wood, leaves, and mulch. These wastes are typically generated at locations outside of the Property, i.e. at the customers' properties where tree maintenance services are provided. The only products that could be considered an industrial waste are the pesticides used by Bartlett.

The pesticides used by Bartlett on an annual basis include the following:

Accord	2.5 Gallons per year
Alamo	1 Quart per year
Astro	8 Gallons per year
Baseline	24 Quarts per year
Conserve	24 Quarts per year
Distance IGR	10 Quarts per year
Kocide	20 Pounds per year
Lucid	12 Quarts per year
Pyronyl	10 Quarts per year
Rainbow Hort Oil	20 Gallons per year
Reliant	2 Gallons per year
Round Up Quick Pro	3 Pounds per year
Talstar P	6 Gallons per year
Trimtec Plus	1 Gallon per year
Xytect 2F	9 Gallons per year

These pesticides are generally products routinely available for sale for use by residents from stores such as WalMart or Home Depot, which Bartlett uses in the typical concentration used by individuals at their homes. The volumes recited above are the quantities used per year, meaning that only a fraction of those volumes are typically present at the Property. The chemical name, brand name, and chemical content of the pesticides currently used by Bartlett are thoroughly described on the label specimens for the pesticides, which have been provided as part of this response package. (Index ##29-44).

The products are stored in the pesticide storage container, which is built to EPA and DEC standards for pesticide storage, including an impervious floor, containment berm, and fireproofing. Bartlett orders the products from different distributors. They are shipped via an overnight carrier, after which point Bartlett employees bring the products to the pesticide shed and record them in inventory. Bartlett technicians, which include a small number of Bartlett's employees, mix the proper quantities of pesticide at the customer's property. The quantities used typically are in the order of a few ounces per 100 gallons of water. Only the portion required for a customer's needs is prepared. Consistent with DEC and EPA-required practice, when the pesticide container is empty, it is triple rinsed back into Bartlett's mixing tanks on their service vehicles, and the containers are recycled or landfilled as municipal waste.

The Technical Memorandum discusses the presence of any substances that could be attributed to wastes used, stored, generated, handled or received by Bartlett at the Property, concluding that the substances present relate predominantly to pesticide use, and that TCE, PCE, DCE and other chlorinated or non-chlorinated solvents were generally not disposed of at this Property, but instead appear to have migrated from locations offsite. Those wastes are identified above in Bartlett's Response to Question 4(c), as well as in the accompanying investigations and reports submitted with Bartlett's Response, and in the Technical Memorandum.

This information was derived from a number of documents submitted with this response package, including the pesticide information and labels referenced above. The accompanying Index identifies which documents contain information used in the response to this question. Portions of this information were provided by David Marren, Esq., Vice President of Safety and Regulatory Affairs, The F.A. Bartlett Tree Expert Company, 13768 Hamilton Rd. Charlotte, NC 28278; (704)-588-1150 O; (704)-588-5152 F. Portions of this information were provided by Frank Williams, PG, Brown & Caldwell, 234 Hudson Avenue Albany, New York 12210, the primary author of the reports and Technical Memorandum submitted with this response package.

b. *State when each industrial waste identified in your response to question 6a., above, was used, stored, generated, handled or received, and state the volume of*

each industrial waste used, stored, generated and/or handled on an annual basis; and

As stated, Bartlett does not engage in manufacturing so it does not produce industrial waste. The only substance used by Bartlett that could be considered to generate industrial waste is the pesticides which Bartlett uses in its ordinary business practices. As discussed in the Response to Question 6(a), the approximate volume of pesticides used per year is small, in the range of a few gallons per year of product. As stated in the Response to Question 6(a) above and Response 7, below, Bartlett properly manages the containers in accordance with State and Federal practices, and the containers, and their rinse water, are properly disposed of.

This information was derived from a number of documents submitted with this response package, including the pesticide information and labels referenced above. The accompanying Index identifies which documents contain information used in the response to this question. Portions of this information were provided by David Marren, Esq., Vice President of Safety and Regulatory Affairs, The F.A. Bartlett Tree Expert Company, 13768 Hamilton Rd. Charlotte, NC 28278; (704)-588-1150 O; (704)-588-5152 F.

c. *Describe the activity or activities in which each industrial waste identified in your response to question 6a., above, was used, stored, handled or received.*

To the extent the pesticides could be considered industrial waste, Bartlett uses pesticides to manage and treat its clients' trees. Bartlett's practices of using, storing, handling and receiving the pesticides are described in the Response to Question 6(a).

This information was derived from a number of documents submitted with this response package, including the pesticide information and labels referenced above. The accompanying Index identifies which documents contain information used in the response to this question. Portions of this information were provided by David Marren, Esq., Vice President of Safety and Regulatory Affairs, The F.A. Bartlett Tree Expert Company, 13768 Hamilton Rd. Charlotte, NC 28278; (704)-588-1150 O; (704)-588-5152 F.

7. *Describe in detail how and where the industrial wastes identified in response to question 6., above, were disposed. For each disposal location and method, state the nature and quantity of the material disposed of on an annual basis. For those time periods when a precise quantity is not available, provide an estimate:*

With respect to the vast majority of waste generated by Bartlett, those wastes are typical solid wastes which are disposed of at the proper facilities. All wood, wood chips, branches and green waste, are brought to Vigliotti Recycling Corp.,

Yard Waste Transfer Facility, at 100 Urban Ave, Westbury, NY 11590. This facility is a certified, secured dump which is able to accept all wood waste. For all debris created on various job sites that requires a waste transfer company to come to the site to take the waste, the company used is Beaver Industries, Inc., 1200 Townline Road, Hauppauge, NY 11788. This company brings roll off dumpsters that are filed with wood and debris, then comes to collect it. There are no records of ever using the New Cassell/Hicksville dump, nor does any person currently working at Bartlett's office have any knowledge of ever using this dump for any waste disposal.

With respect to the pesticides used by Bartlett, Bartlett complies with New York State and EPA requirements for pesticide container management. Some pesticide containers are triple rinsed, washed, and recycled. All other pesticide containers are triple rinsed, washed, and placed in the trash as normal waste, which is picked up weekly by the local municipality. Given the small quantities of pesticide maintained by Bartlett, Bartlett disposes of or recycles a small number of pesticide containers on an average basis, in the order of no more than a few per week. As stated in the Response to Question 6(a), no rinse water is di sposed of, it is all reused.

This information was provided by David Marren, Esq., Vice President of Safety and Regulatory Affairs, The F.A. Bartlett Tree Expert Company, 13768 Hamilton Rd. Charlotte, NC 28278; (704)-588-1150 O; (704)-588-5152 F.

8. *Describe in detail any knowledge your Company has about intentional or unintentional disposal of industrial wastes at each Property identified in response to question 2., above, including, but not limited to, TCE, PCE and/or other chlorinated or non-chlorinated solvents or wastes containing such solvents, at any time currently or in the past. Your response should include instances in which industrial wastes were spilled or otherwise disposed onto or into the floors or the ground from septic systems, pipes, drains, drums, tanks, or by any other means. Provide copies of all documents relevant to your response:*

The Technical Memorandum discusses the presence of industrial wastes at the Property, concluding that the substances present relate predominantly to pesticide use, and that TCE, PCE, and other chlorinated or non-chlorinated solvents were not generally disposed of at this Property, but instead appear to have migrated from locations offsite.

Bartlett is unaware of any disposal of industrial waste, and in particular, of TCE, PCE and/or other chlorinated or non-chlorinated solvents or wastes, that occurred at the Property as part of Bartlett's operations. However, the extensive investigations of the Property have revealed potential historical spills or other discharges that occurred. These instances have been described in detail in

Response to Question 4(c) above, as well as in the Remedial Investigation Report and other reports prepared in relation to the Property, and the Technical Memorandum, all of which are submitted with this response.

Additionally, Bartlett's lease with George Oil Corp. of Lot 786 from July 1, 1988 to June 30, 1991 (Index # 3 submitted herewith), reserves George Oil Corp.'s right to access the property "in the area where Landlord formerly maintained underground oil tanks so as to permit such maintenance and testing as is required by any environmental agency." Lease at p. 5. Bartlett has no knowledge of George Oil Corp.'s operations, the presence of any underground oil tanks, or any maintenance and testing requirements. Additionally, Bartlett never observed George Oil Corp., or anyone acting on their behalf, accessing the leased premises to maintain or test the tanks. This lack of knowledge is likely due to the limited lease term, and Bartlett's sporadic access of this area (i.e. to access or drop off vehicles.)

This information was derived from a number of documents submitted with this response package. The accompanying Index identifies which documents contain information used in the response to this question. Portions of this information were provided by David Marren, Esq., Vice President of Safety and Regulatory Affairs, The F.A. Bartlett Tree Expert Company, 13768 Hamilton Rd. Charlotte, NC 28278; (704)-588-1150 O; (704)-588-5152 F.

9. *Identify all leaks, spills, or releases of any kind of any industrial wastes (including, but not limited to, TCE and PCE or other chlorinated or non-chlorinated solvents or wastes containing such solvents) into the environment that have occurred, or may have occurred, at or from the Property, including any leaks or releases from drums and other containers. Provide copies of all documents relevant to your response:*

See Bartlett's Response to Question 8.

10. *Explain whether any repairs or construction were implemented to address any leaks, spills, releases or threats of releases of any kind, the nature of the work and the dates of any such work. Provide copies of all analyses, characterizations, environmental assessments or studies or any report or other description of any investigations, removal actions, remedial activities, or any other work conducted by your Company or by any other party on your Company's behalf relating to industrial wastes released at or from any Property and/or the Site. If any copies of the records requested in this question are available electronically, kindly submit your answer to this question on a disk:*

See Bartlett's Response to Question 8. Additionally, as stated above, the Property is the subject of the Consent Order with DEC, which requires that Bartlett investigate and remediate the Property. Accordingly, Bartlett has undertaken

substantial site investigation and is working with DEC to develop appropriate remedial alternatives. This submittal includes electronic copies of the various investigation work plans and reports completed and submitted to DEC to date, and an Index listing those documents for EPA's reference.

11. This information was derived from a number of documents submitted with this response package. The accompanying Index identifies which documents contain information used in the response to this question. *Provide copies of all insurance policies held and indemnification agreements entered into by the Company which may potentially indemnify the Company against any liability which it may be found to have under CERCLA for releases and threatened releases of hazardous substances at and from the Property. In response to this request, please provide not only those insurance policies and agreements which currently are in effect, but also those that were in effect during any portion of the time the Company conducted operations at, or held a property interest. Your response should also identify the specific Property related to each policy and/or agreement:*

Bartlett is self-insured and holds no insurance policies and is not a party to any indemnification agreements which may potentially indemnify Bartlett against any liability it may be found to have under CERCLA.

This information was provided by David Marren, Esq., Vice President of Safety and Regulatory Affairs, The F.A. Bartlett Tree Expert Company, 13768 Hamilton Rd. Charlotte, NC 28278; (704)-588-1150 O; (704)-588-5152 F.

12. State the names, telephone numbers and present or last known addresses of all individuals whom you have reason to believe may have knowledge, information or documents regarding the use, storage, generation, disposal of or handling of industrial wastes at the Site, the transportation of such materials to the Site, or the identity of any companies whose material was treated or disposed of at the Site:

No industrial waste was treated at the Property. To Bartlett's knowledge, no industrial wastes were disposed of at the Property. Accordingly, Bartlett has no contact information for individuals with knowledge of those practices. Bartlett's current employees, including David T. McMaster, Vice President of Division Two, and Justin Walker, manager of Bartlett's Union Avenue operation, may have information on current pesticide handling methods and related issues, and they may be reached at the Property at 345 Union Avenue, Westbury, NY, by mail at P.O. Box 889, Westbury, NY 11590-0889, or by phone at 516-334-0648.

This submission reflects the knowledge of other Bartlett employees, as well as the consultant that has had primary responsibility for investigating the Property. Accordingly, there are no other individuals Bartlett can identify at this time.

This information was provided by David Marren, Esq., Vice President of Safety and Regulatory Affairs, The F.A. Bartlett Tree Expert Company, 13768 Hamilton Rd. Charlotte, NC 28278; (704)-588-1150 O; (704)-588-5152 F.

13. *If you have information or documents which may help EPA identify other companies that conducted operations, owned property, or were responsible for the handling, use, storage, treatment, or disposal of industrial wastes that potentially contributed to chlorinated solvent contamination of the Site, please provide that information and those documents, and identify the source(s) of your information:*

The Technical Memorandum provides information about properties near Bartlett's properties which, based on publicly available information, are identified as having either spilled or discharged industrial wastes that potentially contributed to the chlorinated solvent contamination of the Site, or that, based on their operations, may use or store chlorinated solvents. Beyond this information, however, Bartlett has no such information at this time.

Portions of this information were provided by Frank Williams, PG, Brown & Caldwell, 234 Hudson Avenue Albany, New York 12210, the primary author of the reports and Technical Memorandum submitted with this response package. Portions of this information were provided by David Marren, Esq., Vice President of Safety and Regulatory Affairs, The F.A. Bartlett Tree Expert Company, 13768 Hamilton Rd. Charlotte, NC 28278; (704)-588-1150 O; (704)-588-5152 F.

14. *Please state the name, title and address of each individual who assisted or was consulted in the preparation of your response to this Request for Information. In addition, state whether each such person has personal knowledge of the answers provided.*

David G. Marren, VP of Safety and Regulatory Affairs
The F.A. Bartlett Tree Expert Company
13768 Hamilton Rd.
Charlotte, NC 28278

Mr. Marren has personal knowledge of the information he provided.

Frank Williams, PG
Brown & Caldwell
234 Hudson Avenue
Albany, New York 12210

Mr. Williams has personal knowledge of the investigations and remedial work he performed at the Property. Much of the background information relating to the Property included in the reports and work plans prepared was derived from historical documents, which documents are included as appendices to those reports. Those reports are included in this submission, and listed in the attached Index4842-5655-9637, v. 2